

EXHIBIT 4

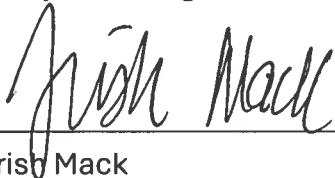
Next Friend Affidavit of Trish Mack

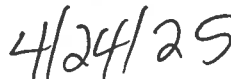
AFFIDAVIT OF NEXT FRIEND TRISH MACK

1. My name is Trish Mack. I am over the age of 18 and competent to testify. I am a U.S. citizen residing in Livingston, Louisiana.
2. I have known Adiel Mendez Sagastume and his wife for about a year. I see him frequently and know him well.
3. Adiel and his wife, Jenny, are both incredibly nice. The way Adiel talks about his wife and his children, you can tell how much love he has for them. His family is loving and supportive. I know Adiel to be a great dad and husband. The family is involved in the community, and they take great care of their children and each other. Adiel is a hard worker and phenomenal person. The way he talks about his children, they couldn't ask for a better dad.
4. On April 24, 2025, I accepted the responsibility of taking provisional custody of Adiel's children, including the baby V.M.L. I don't know everything about their situation, but my understanding is that it is helpful to the family to have another person be delegated temporary custodial authority for the children to make sure they are as well cared-for as possible. I am happy to support the family in this way.
5. I have met the baby V.M.L. when she has been with Adiel's wife Jenny. I am a mother, and I have seen how well they have done caring for her. I also know that Jenny is in the early stages of a new pregnancy, and the family has been so happy to welcome a new baby. I am concerned for the stress Jenny is under as a mom in this situation being so early in her pregnancy.
6. In my role as V.M.L.'s custodian, I have her best interest at heart. It is not in her best interest to be locked up by immigration or anyone else. Her welfare is the number one priority, to make sure she is safe and that her rights as a U.S. citizen are not being violated.
7. I have been trying to help Adiel figure out where his family is since they were taken into custody. On April 23, 2025, Adiel let me know that Jenny and the girls were arrested the day before at their appointment. Since then, I've been calling everywhere I could to find out where they are and to check on their welfare. I have primarily been calling the phone number for the New Orleans ICE Field Office, but that number routes to a national call center. I have spoken to several people there and have said to all of them that I am trying to check on the welfare of the family.

8. The first person I spoke with was not able to provide me with much information. All I had was Jenny's name, and she was able to confirm she was in ICE custody, but told me to just keep checking the ICE Detainee Locator online. The second person I talked to said he could not give me any information because I did not have her A-number. The third person I spoke with told me that she could confirm that she was in ICE custody, but that they were waiting for things to update and to keep checking the Detainee Locator. She then told me that they were in a temporary hotel location.
9. Through all of these calls, I was never able to speak with anyone at the New Orleans ICE Field Office because the phone number was routing to the call center. Another person at the call center told me that I needed to speak with the Field Office directly and ask for Jenny's Case Officer, but I have never been able to speak with anyone at the Field Office.
10. Sometime yesterday, I found a different phone number for removal operations and I called that number. The man I spoke with understood my concerns and put me on hold. When he came back, he said that he saw that there were some updates going on, but that he could not disclose them. He said that if I called back later that evening or in the morning, they could tell me what was going on. I called back later in the day but I got someone else and there was no additional information they could give me except that they were in ICE custody and to check the online Detainee Locator.
11. I am willing and able to serve as Next Friend for V.M.L. I am dedicated to her best interest and do not have any known conflicts of interest.

I swear and affirm under penalty of perjury that the preceding is true and correct to the best of my knowledge.


Trish Mack


Date